

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 19 B 06921
 Jayvon D Collier,) HON. Jacqueline P. Cox
) CHAPTER 13
 DEBTOR.)

NOTICE OF MOTION

TO: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603, via electronic court notification;

Anna Valencia, City Clerk, 121 N. LaSalle Street, Room 107, Chicago, IL 60602;

See attached service list.

Please take notice that on March 9, 2020, at 10:00 a.m. I shall appear before the Honorable Judge Jacqueline P. Cox in Courtroom 680 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he sent this notice and the attached motion on January 27, 2020, to:

The Chapter 13 Trustee listed above via electronic notice; and
To the attached service list via U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603.

/s/ Steve Miljus
Attorney for Debtor
The Semrad Law Firm, LLC
20 South Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625

0752-1

Case 19-06921

Northern District of Illinois

Eastern Division

Mon Jan 27 05:23:38 CST 2020

AMERICAN CREDIT ACCEPT

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CONSERVE

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Department of Revenue - PO Box 88292

Chicago, IL 60680

City of Chicago Department of Finance

c/o Arnold Scott Harris, P.C.

111 W. Jackson Blvd Ste. 600

Chicago, IL 60604-3517

Comcast

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UNITED STATES DEPARTMENT OF EDUCATION

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Tom Vaughn

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End of Label Matrix

Mailable recipients 15

Bypassed recipients 0

Total 15

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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Jayvon D Collier, by and through Debtor's attorneys, The Semrad Law Firm, LLC and hereby moves this Honorable Court to modify the confirmed Chapter 13 Plan. Debtor states the following:

1. On March 13, 2019, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On May 13, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan of reorganization.
3. The confirmed Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 10.00% of their allowed claims.
4. The confirmed Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$150.00 monthly for 36 months.
5. Debtor was unable to afford both regular expenses and her Plan payment. As a result, a default accrued.
6. Debtor can continue making timely plan payments moving forward.
7. Debtor respectfully requests this Honorable Court to defer the current plan default to the end of the plan of reorganization.
8. Debtor is in a position to proceed with the instant case.

9. Debtors has filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order modifying the Debtor's Chapter 13 Plan in order to defer the current plan default to the end of the plan of reorganization; and
- B. For such other and further relief as the Court deems fair and proper.

/s/ Steve Miljus
Attorney for Debtor

The Semrad Law Firm, LLC
20 South Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625